



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

217-782-7326

July 19, 2010

Via CDX

Eurika Durr, Clerk of the Board
Environmental Appeals Board
U.S. Environmental Protection Agency
Colorado Building
1341 G Street, N.W. Suite 600
Washington, D.C. 20005

Re: *Vulcan Construction Materials LP*
PSD Appeal No. 10-11

Dear Ms. Durr:

Please find attached the *Certified Index of the Administrative Record* and *Affidavit of Minesh Patel* that was assembled by the Illinois Environmental Protection Agency ("Illinois EPA") for the above-captioned proceeding. Notice of this submission is being mailed to all individuals shown in the attached service list.

If you have any questions or concerns regarding this matter, please do not hesitate to contact me at (217)782-7326. Thank you for your attention to this matter.

Sincerely,

Laurel L. Kroack
Chief, Bureau of Air

Mailing List

First Class Mail:

David C. Bender
McGillivray Westerberg & Bender, LLC
305 South Paterson Street
Madison, Wisconsin 53703

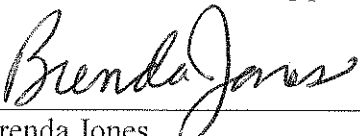
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I hereby certify that copies of the foregoing were sent to the following persons on this date, July 19, 2010.



Brenda Jones
Executive Secretary II

**BEFORE THE ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.**

In re:)
)
Vulcan Construction Materials, LP) PSD APPEAL NO. 10-11
)
Permit No. 091806 AAB)

CERTIFIED INDEX OF ADMINISTRATIVE RECORD

Vulcan Construction Materials, LP, permit application

1. Cover letter and attached PSD permit application from Vulcan Construction Materials, LP (“Vulcan”), to Illinois EPA, dated October 24, 2003.
2. Facsimile cover sheet from MATEC to Illinois EPA, dated December 3, 2003, containing attached Request for Additional Information letter and excerpts from PSD permit application.
3. Facsimile cover sheet and attached letter from Vulcan to Illinois EPA, dated December 5, 2003, responding to Request for Additional Information letter.
4. Letter from Vulcan to Illinois EPA, dated December 5, 2003, responding to Request for Additional Information letter.
5. Letter and enclosed cd-rom from Illinois EPA to MATEC, dated January 5, 2004, relating to earlier modeling files.
6. Letter and attached permit supplement from Vulcan to Illinois EPA, dated January 9, 2004, relating to BACT evaluation for SO₂.
7. Letter, attached permit supplement and enclosed cd-roms from Air Control Techniques to Illinois EPA, dated June 14, 2004, relating to the net air quality impact analyses.
8. Letter and enclosed cd-roms from Air Control Techniques to Illinois EPA, dated September 9, 2004, relating to modified rates of CO emissions and PM₁₀ fugitive emissions.
9. Aerial photograph of Manteno facility, dated October 10, 2004.
10. Facsimile cover sheet and attached letter from Vulcan to Illinois EPA, dated January 12, 2005, relating to kiln shut-down.

11. Letter from Air Control Techniques to Illinois EPA, dated January 14, 2005, responding to requested information.
12. Letter from Air Control Techniques to Illinois EPA, dated April 5, 2005, relating to review of dispersion modeling results.
13. Letter and attached permit supplements from Air Control Techniques to Illinois EPA, dated July 6, 2006, relating to BACT analysis and air modeling of PM10 emissions.
14. Email from Vulcan to Illinois EPA, dated July 22, 2008, relating to draft PM10 emissions impact analysis.
15. Letter and attached permit supplements from Vulcan to Illinois EPA, dated November 14, 2008, relating to updated BACT analyses, air quality net impact analyses and PM10 emissions impact analysis.
16. Letter, attached permit supplements and enclosed cd-roms from Air Control Techniques to Illinois EPA, dated November 14, 2008, relating to PM10 emissions impact analysis and air quality net impact analysis.
17. Letter and attached permit supplements from Vulcan Materials to Illinois EPA, dated January 20, 2009, relating to plant layout diagrams, flow-sheets and 260-CAAPP permit forms.
18. PM10 emissions impact analysis, dated January 21, 2009.
19. Letter from Air Control Techniques to Illinois EPA, dated March 4, 2009, relating to revised AERMOD modeling.
20. Letter from Air Control Techniques to Illinois EPA, dated March 5, 2009, relating to the PM10 annual average modeling results from AERMOD modeling.
21. Estimates submitted by Vulcan to Illinois EPA relating to cost of fuel for SCR, dated April 8, 2010.

Public hearing

22. Hearing transcript of June 4, 2009, public hearing.
23. File containing Hearing Officer order regarding extension of comment period, dated July 1, 2009, and related Sierra Club correspondence.
24. File containing Hearing Officer's miscellaneous correspondence/emails. [Selected contents of four internal agency emails were not included in the administrative record on

the grounds that they contain opinions and/or agency deliberations regarding policy/actions].

25. File containing miscellaneous materials, including file opening memorandum, post-it note and business card.
26. File containing exhibits recorded by Hearing Officer that were received at public hearing and submitted during public comment period.
27. Two files containing exhibits attached to Sierra Club's comments.

Permit review

28. Notice of comment period and public hearing relating to Vulcan project.
29. File containing Illinois EPA working drafts of Project Summary – dated November 17, 2004, December 30, 2009, April 8, 2010, and one undated version.
30. Final Project Summary.
31. File containing Illinois EPA working drafts of permit – April 29, 2008 (two versions); December 19, 2008; March 16, 2009; April 16, 2009 (two versions); April 23, 2009; April 8, 2010; and ten undated versions. [Four working drafts, or selected portions thereof, were not included in the administrative record on the grounds that they contain opinions and/or agency deliberations regarding policy/actions].
32. File containing Vulcan comments to various drafts of permit – dated September 9, 2004; February 23, 2005; May 30, 2007; August 31, 2007; February 5, 2009; February 9, 2009; April 15, 2009; April 2, 2010; and one undated version.
33. File containing Vulcan responses to public comments – letter from Vulcan relating to drainage issues, dated July 20, 2009; letter from Vulcan relating to preconstruction monitoring, dated September 4, 2009; three letters (two from Vulcan and the other from Air Control Techniques) relating to BACT evaluations, dated September 4, 2009; letter and attachments from Air Control Techniques relating to fugitive PM10 emissions, dated September 4, 2009; letter and attachments from Air Control Techniques relating to dispersion modeling, dated September 4, 2009.
34. Draft Construction Permit/PSD Approval – Revised NSPS Source issued for public notice.

35. File containing Request for Additional Information letters, dated November 3, 2003, and June 6, 2006.
36. File containing air quality planning memoranda prepared by Matthew Harrell relating to Vulcan project – memorandum relating to SO₂ impact, dated April 4, 2003; memorandum relating to air quality analysis, dated July 29, 2004; memorandum relating to air quality analysis, dated November 15, 2007; memorandum relating to PSD memorandum addendum, dated December 10, 2007; memorandum relating to air quality analysis, dated March 6, 2009; memorandum relating to PSD updates, dated April 8, 2010.
37. File of materials assembled by Matthew Harrell containing miscellaneous modeling data.
38. Set of four cd-rom disks containing comprehensive modeling files for the project [dating from original permit issuance in 1996 through current application].
39. File containing hand-written notes from Chris Romaine, attached tables and internal email relating to PM_{2.5} development of three-year background value.
40. Final Calculation Sheet and attachments, dated April 9, 2010, and three working drafts, dated November 5, 2003, June 2, 2006 and April 9, 2010.
41. File containing materials relating to Endangered Species Act review – email from Conestoga-Rovers & Associates to Illinois EPA, dated November 9, 2009, with attached cover letter from USEPA/Region V; copy of USEPA/Region V cover letter and supporting documentation, dated November 9, 2009.
42. Letter submitted to Vulcan Advisory Committee Members from Mulciber Hephaestus, dated March 5, 2008, relating to restarting of Manteno lime plant.
43. File containing miscellaneous hand-written notes/comments generated by Chris Romaine.
44. File containing miscellaneous hand-written notes/comments generated by Minesh Patel.
45. File containing miscellaneous hand-written notes/comments generated by Matthew Harrell.
46. File containing miscellaneous emails relating to Vulcan project, dating from March 13, 2003 through April 12, 2010. [Selected contents of sixteen internal agency emails were not included in the administrative record on the grounds that said contents contain opinions and/or agency

deliberations regarding policy/actions, or are subject to the attorney-client privilege].

47. File containing permit fee determination application submitted by Vulcan, dated February 20, 2009, and completeness review worksheet for permit fees, dated October 31, 2003.
48. File containing draft responsiveness summary responses. [Selected contents of one draft were not included in the administrative record on the grounds that it is subject to the attorney-client privilege].
49. Final Notice of Final Permit Decision letters and accompanying mailing list, dated April 9, 2010.
50. Final Responsiveness Summary.
51. Final Construction Permit/PSD Approval – Revised NSPS Source, dated April 9, 2010.

Support documents

52. File of materials relating to first major permit revision to original permit issued to Vulcan, including: Final Revised Construction Permit/PSD Approval/NSPS Source, dated October 28, 2002; Calculation Sheet, dated October 28, 2002; permit applications, dated July 22, 1999, March 28, 2001 and February 14, 2002; miscellaneous permit supplements and related correspondence.
53. File of materials relating to first minor revision to original permit issued to Vulcan, including Final Revised Construction Permit/PSD Approval/NSPS Source, dated May 12, 1998.
54. File of materials relating to original permit issued to Vulcan, including: Final Construction Permit/PSD Approval/NSPS Source, dated May 15, 1996; accompanying public notice and fact sheet; permit application and enclosed modeling files stored on 3½ inch diskettes, dated February 2, 1996; and related correspondence.
55. File of historical emission test reports performed for Vulcan, dated October 28 and 29, 1998, November 12 and 13, 1998, and January 29, 1999.
56. File of historical daily operating reports for Manteno lime plant, dated October, November and December 1998.
57. Excerpts from a USEPA report entitled “Our Nation’s Air, Status and Trends Through 2008” [EPA-454/R-09-002].
58. File containing information obtained from Wikipedia website relating to the City of Joliet and the Village of Midlothian.

59. File containing information relating to biomass potential: two narrative discussions of Illinois and Wisconsin biofuel potential from the U.S. Department of Energy website; a narrative discussion regarding “renewables” and biomass feedstocks from the U.S. Department of Energy website; and a report entitled “Biomass, Multi-Year Program Plan (December 2009)” prepared by the Office of the Biomass Program of the U.S. Department of Energy.
60. File containing USEPA Fact Sheet information relating to control technology: a document addressing SCR technology for control of NO_x [EPA-452/F-03-032]; a document addressing FGD technology for control of SO₂ [EPA-452/F-03-034]; and a document addressing fabric filter technology for particulate matter pollutants [Docket No. A-95-41, Item No. II-A-38].
61. File containing information obtained from the U.S. Energy Information Administration (“USEIA”) website: a narrative discussion of energy price volatility and forecast uncertainty; a graph depicting the Henry hub natural gas price for the period of January 2009 projected through May 2011; a reference to definitions, sources and explanatory notes regarding natural gas prices; a narrative discussion of the Annual Energy Outlook Early Release Overview [DOE/EIA-0383 (2010)]; a Table 13. Energy Prices by Sector and Source and accompanying endnotes; and a report entitled “Annual Energy Outlook 2009 with Projections to 2030” [DOE/EIA-0383 (March 2009)].
62. An article obtained from the USEIA website relating to biodiesel performance, costs and use.
63. File containing information obtained from the USEIA website: graphs depicting the annual Illinois natural gas industrial price for 1998-2008, the monthly Illinois natural gas industrial price for 2001-2010, the monthly U.S. natural gas industrial price for 2001-2010, the monthly Indiana natural gas price for 2001-2010, and a chart depicting 2009 natural gas prices in all US states.
64. File containing excerpts from USEPA’s 1998 publication of AP-42 relating to lime manufacturing from the Mineral Products Industry section and the Miscellaneous Sources section.
65. File containing information relating to the development of AP-42 emission factors: a narrative discussion of a zip.file relating to lime manufacturing in Section 11.17 of the AP-42; a report entitled “Procedures for Preparing Emission Factor Documents” (November 1997)[EPA-454/R-95-015 (revised)]; and a USEPA report entitled “Emission Factor Documentation for AP-42 Section 11.15” (April 28, 1994).
66. File containing copy of EAB’s decision in *General Motors, Inc.*, PSD Appeal No. 01-30 (March 6, 2002) and a two-paged excerpt from *Northern Michigan University*, PSD Appeal No. 08-02 (February 18, 2009).

67. File containing information relating to Environmental Technology Verification program: a narrative discussion regarding the Air Pollution Control Technology Center obtained from USEPA's website and an article presented at a 2008 Air & Waste Management Association conference entitled "The Evolution of Improved Baghouse Filter Media as Observed in the Environmental Technology Verification Program."
68. Permit application summary form and the Statement of Basis for the Cash Creek Generating Station permit, both prepared by the Commonwealth of Kentucky Division for Air Quality.
69. Excerpts from Kansas statute, Chapter 65, Article 30, sections 65-3008 and 65-3008a.
70. File containing information relating to news articles on the topic of greenhouse gases and climate change: an article from The New Yorker entitled "Up in the Air;" a news article from the Washington Post's website; a USEPA news release from April 1, 2010; a reference to key dates in global warming from the Chicago Tribune's website; a news article from MSNBC's website; a news article from US News and World Report; an opinion article from the Economist.com; a news article from the Planet Panel; and eight news articles and two opinion articles from the New York Times.
71. Illinois Annual Air Quality Report from November 2009.
72. File containing information relating to lime manufacturing: narrative discussions of calcination, calcium carbonate, magnesium carbonate, hydrate from Wikipedia's website, and a FAQ discussion from Carmeuse Lime and Stone's website.
73. File containing information relating to miscellaneous reference data for Manteno facility: an emissions summary for 1998-2002; a quarterly report, dated October 10, 2001, from Vulcan to Illinois EPA; and a facsimile and attached Vulcan news release, dated October 4, 2000.
74. A copy of USEPA's revised Guideline on Air Quality Models, obtained from Federal Register Online, dated November 9, 2005 (Volume 70, Number 216, Pages 68217-68261).
75. A narrative discussion of Automated Surface Observing System obtained from www.weather.gov website.
76. File containing information relating to modeling of surface roughness: a narrative discussion relating to surface roughness length and a glossary link to "aerodynamic roughness length" obtained from WebMET website.
77. A copy of a USEPA guidance memorandum, dated July 5, 1998, relating to air quality analysis for PSD.

78. File containing information relating to pit effect: a hand-written graph prepared by Chris Romaine depicting data from Nebraska Extension Service; an article entitled "How Windbreaks Work" from the University of Nebraska Extension [EC 91-1763-B]; and a narrative discussion of wind gradient obtained from Wikipedia's website.
79. A copy of Appendix W to Part 51, Guideline on Air Quality Models (current as of April 5, 2010) obtained from e-CFR.
80. File containing background information on natural gas prices: a narrative discussion of natural gas prices and a graph of Henry hub natural gas prices for 2000-2009 obtained from Wikipedia's website, and a policy analysis study prepared by Lexecon entitled "Understanding Natural Gas Markets."
81. A copy of a USEPA report entitled "Alternative Control Techniques Document Update – NOx Emissions from New Cement Kilns" (November 2007) [EPA-453/R-07-006].
82. A copy of a USEPA report entitled "NOx Control Technologies for the Cement Industries: Final Report" (September 2000)[EPA-457/R-00-002].
83. Excerpts from guidance for NSPS and NESHAP regulations relating to compliance procedures (i.e., 40 CFR §60.343 and §60.344, and 40 CFR §63.7112, §63.7113, §63.7120, §63.7121, §63.7132 and §63.7142), as obtained from e-CFR website.
84. A copy of NSPS regulations, Subpart HH – Standards of Performance for Lime Manufacturing Plants, found at 40 CFR §60.340 - §60.344.
85. File containing information relating to development of NESHAP regulations for lime manufacturing: USEPA/Research Triangle Park memoranda relating to lime manufacturing NESHAP docket [Docket No. A-95-41, Item Nos. II-B-36, II-B-53, II-B-54 and II-B-92].
86. File containing information relating to NESHAP regulations for lime manufacturing: a USEPA Fact Sheet entitled "Final Rule to Reduce Toxic Air Emissions from Lime Manufacturing Plants;" a reference to a Table I to Subpart AAAAA of Part 63 obtained from e-CFR; and an excerpt from the federal register publication of the final NESHAP rule, as obtained from Federal Register Online, dated January 5, 2004 (Volume 69, Number 2, Pages 393-414).
87. File containing information relating to economic impact analysis for NESHAP regulations for lime manufacturing: a draft and a final USEPA report entitled "Economic Impact Analysis for the Lime Manufacturing MACT Standard" (November 2002)[Docket No. OAR-2002-0052, Legacy Docket A-95-41, Item Nos. II-A-44 and IV-A-4 respectively].
88. File containing public comments and responses associated with NESHAP regulations for lime manufacturing: a USEPA document entitled "NESHAP For Lime Manufacturing

Background Information Document – Volume II, Public Comments and Responses (August 2003); public comments submitted by Huron Lime, Inc.; and a cover letter and final report submitted to USEPA by the Small Business Advocacy Review Panel (March 25, 2002).

89. A copy of a 1964 report generated by the Illinois State Geological Survey entitled “Composition of the Ash of Illinois Coals.”
90. File containing information relating to other lime manufacturing plants: a listing of lime manufacturing plants located in the US and Canada obtained from the National Lime Association’s website; a narrative discussion of Utah’s limestone industry and railroads obtained from a UtahRails website; and a national map of chemical lime plant locations obtained from a ChemicalLine website.
91. File containing permitting information relating to Arkansas Lime Company, Batesville plant: a draft Operating Permit issued by the Arkansas Department of Environmental Quality and an Appendix F containing general information relating to the PSD component of the permit.
92. A Title V Operating Permit issued to Graymont Western US Incorporated, Cricket Mountain plant, by the Utah Department of Environmental Quality.
93. File containing information relating to Graymont PA., Inc., Pleasant Grove plant: a narrative discussion of the Pleasant Gap plant obtained from Graymont website; an RBLC report narrative of the plant obtained from USEPA website; and a copy of the Plan Approval issued by the Pennsylvania Department of Environmental Protection.
94. File containing information relating to Graymont WI, LLC, Superior plant: a copy of the Analysis and Preliminary Determination for the construction and operation permits for the Superior plant prepared by the Wisconsin Department of Natural Resources (“WDNR”); a copy of a final Air Pollution Control Permit issued by WDNR; and a report entitled “Correspondence/Memorandum” detailing the response to comments and public hearing summary.
95. File containing information relating to other Graymont plants: a profile on Graymont obtained from Bearings website and a copy of a Class I Application Review by the Nevada Department of Conservation and Natural Resources for the Graymont Western US, Inc., Pilot Peak Operations Area obtained from USEPA’s website.
96. File containing information relating to Mississippi Lime: a copy of four narrative links about food, food raw material, food process water treatment and Vitacal® O Calcium Oxide obtained from Mississippi Lime’s website.
97. A copy of written comments and attachments submitted by the National Lime Association to the North Carolina Department of Environment and Natural Resources regarding VISTA’s Draft Regional Haze Modeling Protocol, dated October 21, 2005.

98. A copy of a report entitled "Stationary Source Control Techniques Document for Fine Particulate Matter" (October 1998), prepared by EC/R Incorporated for USEPA.
99. File containing four USEPA guidance memoranda regarding PM_{2.5} transition and surrogate policy.
100. A copy of a memorandum and attached notes for costs submitted by RTI to USEPA, dated August 19, 2002, relating to lime kiln control costs for retrofitting preheaters to existing kilns [Docket No. A-95-41, Item No. II-B-123].
101. A copy of an RBLC survey obtained from USEPA's website.
102. File containing information relating to Rockford, Illinois airport: a narrative overview of the Rockford Airport obtained from an internet guide to airports; a narrative discussion of the Chicago Rockford International Airport obtained from Wikipedia's website; and five map depictions of the airport.
103. File containing information relating to SCR: a narrative discussion of SCR obtained from Wikipedia's website and excerpts from a draft of the Responsiveness Summary for the Vulcan project.
104. A copy of a USEPA memorandum, dated April 14, 2000, relating to sensitivity analysis of stoichiometric ratio between lime kiln PM and lime kiln acid gases [Docket No. A-95-41, Item No. II-B-91].
105. A copy of a report, dated June 27, 1969, submitted by the Battelle Memorial Institute to the National Air Pollution Control Administrator entitled "Investigation of the Reactivity of Limestone and Dolomite for Capturing SO₂ from Flue Gas."
106. File containing information relating to dry scrubbers: an excerpt from the Introduction to Baseline Source Inspection Techniques, entitled "Lesson 5 – Operation of Dry Scrubbers," and a copy of a report presented to POWER-GEN International 2000 in November 2000 entitled "Retrofitting Lime Spray Dryers at Public Service Company of Colorado."
107. A copy of a USEPA report entitled "Controlling SO₂ Emissions: A Review of Technologies" (November 2000)[EPA/600/R-00/093].
108. A copy of a graph, identified as Figure 1 - Predicted Behavior of a Scrubber, and containing the hand-written notes of Chris Romaine.
109. File containing information relating to USEPA ambient monitoring guidelines: a USEPA document entitled "Ambient Monitoring Guidelines for PSD" (May 1978)[EPA-450/278-019] and a later document by the same name (May 1987)[EPA-450/4-87-007].

110. A copy of USEPA's rulemaking granting a waiver of preemption for California's 2009 and later model year greenhouse gas standards for new motor vehicles, obtained from the Federal Register Online (July 8, 2009)[Volume 74, Number 129, Pages 32743-32784].
111. A copy of the Response to Public Comments prepared by USEPA for the draft PSD permit issued for the Deseret Power Electric Cooperative Bonanza Power Plant.
112. File containing information relating to USEPA's reconsideration of Johnson memorandum: two copies (one in pre-published form, the other in published form) of the Federal Register notice relating to USEPA's reconsideration of the Johnson memorandum and the interpretation of regulations that determine pollutants encompassed by the PSD program, as found at 74 Fed. Reg. No. 193, Pages 51535-51549 (October 7, 2009), and a copy of a USEPA fact sheet concerning the same.
113. A copy of the Federal Register notice relating to USEPA's Endangerment and Cause or Contribute Findings for Greenhouse Gases under Section 202(a) of the Clean Air Act, as found at 74 Fed. Reg. No. 239, Pages 66496-66546 (December 15, 2009).
114. A copy of USEPA's Title V petition response in the matter involving Louisville Gas and Electric Company's Trimble County, Kentucky plant.
115. File containing information relating to reporting of greenhouse gases: a copy of the Federal Register notice relating to USEPA's Mandatory Reporting of Greenhouse Gases, as found in 74 Fed. Reg. No. 209, pages 56260-56519 (October 30, 2009), and a technical support document prepared by USEPA entitled "Technical Support Document for the Lime Manufacturing Sector: Proposed Rule for Mandatory Reporting of Greenhouse Gases," dated January 22, 2009.
116. File containing information relating to permitting of greenhouse gases: a USEPA news release announcing phase-in of Clean Air Act permitting for greenhouse gases, dated March 29, 2010, and a copy of a letter from USEPA's Administrator to Senator Rockefeller IV, dated February 22, 2010.
117. File relating to municipal waste landfills: a USEPA report entitled "Air Emissions from Municipal Solid Waste Landfills – Background Information for Proposed Standards and Guidelines" (March 1991)[EPA-450/3-90-011a] and a USEPA report entitled "Air Emissions from Municipal Solid Waste Landfills – Background Information for Final Standards and Guidelines (December 1995)[EPA-453/R-94-021].
118. File containing information relating to PM2.5 grandfathering provision and PM10 surrogate policy: a copy of a Federal Register notice relating to USEPA's proposed rulemaking to repeal the grandfathering provision and terminate the PM10 policy, as found at 75 Fed. Reg. No. 28, Pages 6827-6836 (February 11, 2010), and a copy of written comments submitted by the NACAA to USEPA, dated March 29, 2010.

119. A copy of USEPA's technical bulletin entitled "Nitrogen Oxides (NOx), Why and How They Are Controlled" (November 1999)[EPA 456/F-99-006].
120. File containing excerpts from a U.S. Geological Survey publication of Mineral Commodity Summaries (January 2010) regarding lime manufacturing.

STATE OF ILLINOIS
COUNTY OF SANGAMON

AFFIDAVIT


I, Minesh Patel, being first duly sworn, depose and state that the following statements set forth in this instrument are true and correct, except as to matters therein stated to on information and belief and, as to such matters, the undersigned certifies that he believes the same to be true:

1. I am employed by the Illinois Environmental Protection Agency ("Illinois EPA") as a permit analyst for the Division of Air Pollution Control's ("DAPC") Permits Section located at 1021 North Grand Avenue East, Springfield, Illinois. I have been employed by the Illinois EPA since 1994.

2. As part of my job responsibilities, I was assigned the review of a permit application, Permit Application No. 96020014 and Id. No. 091806AAB, involving Vulcan Construction Materials, LP, ("Vulcan") and its proposed revisions to a lime manufacturing plant in Manteno, Kankakee County, Illinois. By virtue of my review of the application and the resulting issuance of a state Construction Permit/Prevention of Significant Deterioration Approval – NSPS Emissions Source to Vulcan on April 9, 2010, I am familiar with the materials contained within the permit files relating to the project.

3. I have reviewed the Certified Index of the Administrative Record and, to the best of my knowledge and belief, I find that it is complete and contains that information relied upon by the Illinois EPA in its final permit decision.

Further affiant sayeth not.



Subscribed and Sworn
To Before Me this 15 Day of July 2010.

